

# **EXHIBIT**

## **AG**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PHARMACYCLICS LLC and  
JANSSEN BIOTECH, INC.,

Plaintiffs,

v.

ALVOGEN PINE BROOK LLC and  
NATCO PHARMA LTD.,

Defendants.

C.A. No. 19-434 (CFC)

**REDACTED - PUBLIC  
VERSION**

**JOINT CLAIM CONSTRUCTION BRIEF**

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## 2. Plaintiffs' Technology Background

### a) Crystalline Forms and Salts

Crystalline solids or crystals are solid material in which the atoms or molecules are arranged in a repeating three-dimensional pattern. Myerson Decl. ¶ 27 (B0116). The structure of a crystalline solid (called the crystal lattice) is determined by the position of the molecules relative to each other in three dimensions, their packing arrangement, and their symmetry. *Id.* ¶¶ 28–31 (B0117–18). If a crystalline compound has solvent molecules in its structure, it is referred to as a solvate. Ex. 17, Harry G. Brittain, *Chapter 6: Methods for the Characterization of Polymorphs and Solvates*, in POLYMORPHISM IN PHARMACEUTICAL SOLIDS 227, 228 (1st ed. 1999) (“Brittain”) (B0701). If the solvent is water, it is referred to as a hydrate. *See, e.g.*, '444 Patent, 60:13–14; '753 Patent, 29:38–39. Certain compounds can be crystallized into more than one distinct crystal structure. Different crystal forms of the same material are called “polymorphs.” Myerson Decl. ¶ 32 (B0118).

Salts are electrically neutral compounds that consist of atoms or molecules held together via bonds that include some degree of ionic transfer between the acid and the base. The positive ion is known as the cation, and the negative ion is known as the anion. Salts of pharmaceutically active compounds are formed by reacting the parent or “free” form of the compound with either an acid or base, depending on the properties of the parent. *See* '444 Patent, 59:33–63; '857 Patent, 24:66–25:22.